

DECLARATION IN SUPPORT OF CIVIL FORFEITURE COMPLAINT

I, Elisa Attaway, a Special Agent with the Internal Revenue Service, Criminal Investigation (IRS-CI) assigned to the Dallas Field Office, being duly sworn, depose and state:

I. Introduction

1. I am a Special Agent employed by the IRS-CI and have been so employed since July 2003. My official duties include investigating possible criminal tax violations and/or tax-related violations of Title 18, 26, and 31 of the United States Code (U.S.C.). Among other training, I successfully completed the Criminal Investigator Training Program and the Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. In addition to receiving training involving tax cases, money-laundering cases, and tax-related cases, I received extensive training in interviewing, search and arrest warrants, firearms, and defensive tactics techniques. I have experience in investigating financial crimes committed by individuals, including financial analysis of bank records, business records, tax records, and raw financial data.

2. The investigation described in this declaration was and is being conducted by the IRS-CI.

3. I am familiar with the information contained in this declaration, either through personal investigation or through discussion with other law enforcement officers and employees, who have participated in and have contributed documentary reports of their investigative efforts in this matter. This declaration is based on personal knowledge I have gained from the participation in this investigation, as well as information relayed to me from other sources.

Because I submit this declaration for the limited purposes described below, I have not included each and every fact I know concerning this investigation.

II. Preview

4. This declaration describes how in or about June 2020 through on or about April 2023, in the Northern District of Texas, PETERSON submitted, or caused to be submitted, 5 fraudulent loan applications to various lenders, in order to obtain \$429,566 in funds through the Paycheck Protection Program (PPP) and PETERSON devised and executed a scheme to defraud the IRS out of at least \$2,764,540 by obtaining money by means of material false and fraudulent pretenses, representations, and promises. In furtherance of the scheme, PETERSON laundered the funds, to include engaging in monetary transactions, affecting interstate commerce, in criminally derived property of a value greater than \$10,000. PETERSON laundered the proceeds through multiple bank accounts and utilized the proceeds of the fraudulent tax refunds for his own personal gain. A portion of the fraudulent proceeds were used to purchase various assets, including the Defendant Property.

III. Real Property Sought for Forfeiture

5. I submit this declaration in support of a complaint that seeks civil forfeiture of the following real property:

County	State	Address	Owner(s)
Orleans Parish	LA	7509 St Charles Ave, New Orleans, LA 70118	Shawn PETERSON Tyler Peterson

IV. Legal Authorities

6. Title 18 U.S.C. § 641 prohibits persons from embezzling, stealing, purloining, or knowingly converting a thing of value of the United States (or any department or agency thereof), or receiving, concealing, or retaining the same with intent to convert it to his use or gain, knowing it was embezzled, stolen, purloined or converted.

7. Title 18 U.S.C. § 1957 prohibits persons from knowingly conducting a monetary transaction in criminally derived property in an amount greater than \$10,000, which is, in fact, proceeds of a specified unlawful activity. Under Section 1957, the four intents have been replaced with a \$10,000 threshold amount for each non-aggregated transaction and the requirement that a financial institution be involved in the transaction.

8. Title 18 U.S.C. § 1014 prohibits a person from knowingly making a false statement or report, or willfully overvaluing any land, property, or security for the purpose of influencing in any way the federal agencies listed in the statute, upon any application, advance, discount, purchase, purchase agreement, repurchase agreement, commitment, loan, or insurance agreement of application for insurance or a guarantee, or any change or extension of any of the same, by renewal, deferment of action or otherwise, or the acceptance, release, or substitution of any security.

9. Title 18 U.S.C. § 1343 prohibits a person, having devised any scheme to defraud, from transmitting by means of wire in interstate commerce any signals for the purpose of executing such scheme.

10. Title 18 U.S.C. § 1344(2) prohibits a person from knowingly executing or attempting to execute a scheme or artifice to obtain any of the moneys, funds, credits, assets,

securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.

11. Title 18 U.S.C., § 981(a)(1)(C) provides that any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Sections 641, 1014, 1343, and 1344(2) is subject to civil forfeiture to the United States.

12. Title 18 U.S.C., § 981(a)(1)(A) provides that any property, real or personal, involved in a transaction or attempted transaction in violation of Section 1957, or any property traceable to such property, is subject to civil forfeiture to the United States.

13. Title 28 U.S.C. § 1355 provides that a forfeiture action may be brought in the district in which any of the acts or omissions giving rise to the forfeiture occurred.

14. Based on the legal authorities set forth above, and the facts and circumstances set forth below, I believe that the property listed in paragraph 5 of this declaration is subject to civil forfeiture pursuant to:

- a. 18 U.S.C. § 981(a)(1)(C), due to the properties being traceable to proceeds of theft of government funds (18 U.S.C. §§ 641); and
- b. 18 U.S.C. § 981(a)(1)(A), due to the properties being involved in money laundering transactions or being traceable to other property involved in money laundering transactions (18 U.S.C. §§ 1957).

V. Investigation Background, Evidence of Fraud

15. As described further below, evidence gathered in the investigation demonstrates that from at least in or around June 2020 through in or around April 2023, PETERSON used fictitious businesses to submit, or caused to be submitted, 5 fraudulent loan applications to various lenders in order to obtain funds through the PPP and file fraudulent Forms 941

(Employer's Quarterly Federal Tax Return) with the IRS claiming fraudulent COVID-19 related tax credits for qualified sick and family leave wages and the employee retention credit for tax periods 2020, 2021, and 2022. The PPP loans were filed under the business names Caze Motive LLC (Caze Motive), Operation Restore Inc. (Operation Restore), and Bringles Broker Inc. (Bringles Broker) and the fraudulent Forms 941 were filed under the business names Caze Motive, Caze and Myers Consultants Inc. (Caze and Myers Consultants), Operation Lending Hand Inc. (Operation Lending Hand), Grabba Car Inc. (Grabba Car), and Bringles Auto Brokers.

Defendant and Relevant Persons and Entities

16. PETERSON's businesses are described as used car sales and appear to operate "on paper", however, the evidence in this investigation, including loan document, IRS documents and bank records, prove there is no indication of typical business activities, and the businesses were only opened for the purpose of filing fraudulent PPP loans and tax returns. Although the business name Bringles Auto Brokers is under the name Anglea PETERSON, PETERSON's sister, evidence proves PETERSON utilized the proceeds of the fraudulent tax refunds for Bringles Auto Brokers for his own personal gain.

17. PETERSON is a resident of New Orleans, LA and Dallas, TX. His last-known residence, 7509 St Charles, New Orleans, LA 70437, is a single-family home located in Orleans County. PETERSON is the owner of this residence along with his daughter, Tyler Peterson, from at least May 12, 2023, through the date of this Affidavit. Previously, PETERSON owned a single-family residence at 13397 Highway 1077, Folsom, LA that he sold in November 2023. PETERSON also resided with Keywana Davis (Davis) at a leased luxury residential apartment, The Christopher at the Union, located at 2323 N Akard St, Apt 2407, Dallas, TX 75201 from approximately May 28, 2022, to October 19, 2023. PETERSON has leased PO Box 601541,

Dallas, TX 75206 from the United States Postal Service since November 20, 2020, and is still current on payments until February 23, 2025. The billing address for the PO Box shows PETERSON's billing address as 2223 Bennett Avenue, Apt 216, Dallas, TX 75206, and his phone number as (224) 266-0874. The PO Box records also show Caze Motive, Caze & Myers Consultants, Operation Lending Hands, and Operation Restore as associated company names of the PO Box. PETERSON has also used residential addresses 2223 Bennett Ave, Apt 302, Dallas, TX 75206, 624 N 5th Street, Garland, TX 75040, and 1910 Pacific Ave, Suite 6060, Dallas, TX 75201 on bank records and other business records, all located in the Northern District of Texas.

18. According to public records, Caze Motive is a Texas corporation that was registered on or about April 23, 2014. PETERSON is listed as the company's owner with addresses 624 N 5th Street, Garland, TX 75040 and 1910 Pacific Ave, Suite 6060/Suite 15200, Dallas, TX 75201.

19. According to public records, Caze & Myers Consultants is a Texas corporation that was registered on or about July 14, 2022. PETERSON is listed as the company's owner with address 1910 Pacific Ave, Suite 15200, Dallas, TX 75201.

20. According to public records, Operation Lending Hands is a Texas corporation that was registered on or about February 23, 2022. PETERSON is listed as the company's owner and the registered business address for Operation Lending Hands is PO Box 601541, Dallas, TX 75206.

21. According to public records, Operation Restore is a Texas corporation registered as a non-profit on or about May 18, 2020. PETERSON is listed as the company's owner with address 1910 Pacific Ave, Suite 6060, Dallas, TX 75201.

22. According to public records, Grabba Car is a Texas corporation that was registered on or about June 9, 2022. PETERSON is listed as the company's owner with address 1910 Pacific Ave, Suite 15200, Dallas, TX 75201.

23. According to public records, Bringles Auto Brokers LLC is a Texas corporation registered on or about September 7, 2022. The Certificate of Formation for Bringles Auto Brokers lists Angela Peterson, PETERSON's sister, as the registered agent and both Angela Peterson and PETERSON as "managing members". However, on October 3, 2022, a Certificate of Correction was filed to correct the Certificate of Formation requesting to delete PETERSON as a managing member of Bringles Auto Brokers. Further, the entity Bringles Auto Brokers was forfeited on February 23, 2024.

The Paycheck Protection Program

24. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act is a federal law enacted in or around March 2020 designed to provide emergency financial assistance to the millions of Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). In or around April 2020, Congress authorized over \$300 billion in additional PPP funding.

25. In order to obtain a PPP loan, a qualifying business must submit a PPP loan application, which is signed by an authorized representative of the business. The PPP loan application requires the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) must state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures are used to calculate the amount of money the small business is eligible to receive

under the PPP. In addition, a business applying for a PPP loan must provide documentation showing its payroll expenses.

26. A PPP loan application must be processed by a participating lender. If a PPP loan application is approved, the participating lender funds the PPP loan using its own monies, which are 100% guaranteed by the Small Business Administration (“SBA”). Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, is transmitted by the lender to the SBA in the course of processing the loan.

27. PPP loan proceeds must be used by the business on certain permissible expenses, namely, payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be entirely forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses a certain amount of the PPP loan proceeds on payroll expenses.

Employee Retention Credit

28. The Employee Retention Credit (ERC) was part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which was passed by Congress and signed into law on March 27, 2020. The ERC was designed to encourage businesses to keep employees on their payroll throughout the Coronavirus Disease 2019 (COVID-19) pandemic. The ERC is a refundable tax credit against certain employment taxes equal to 50% of the qualified wages an eligible employer pays to employees between March 12, 2020, and July 1, 2021. Inasmuch as the ERC can apply to wages already paid after March 12, 2020, qualified employers can get access to the ERC by reducing upcoming payroll tax deposits or requesting an advance credit on a Form 7200 (Advance Payment of Employer Credits Due to COVID-19).

Sick and Family Leave Wage Credit

29. The Families First Coronavirus Response Act (FFCRA) provides small and midsize employers refundable tax credits that reimburse them, dollar-for-dollar, for the cost of providing paid sick and family leave wages to their employees for leave related to COVID-19. The FFCRA gives business with fewer than 500 employees funds to provide employees with paid sick and family and medical leave for reasons related to COVID-19, either for the employee's own health needs or to care for family members.

30. In addition to Form 7200, Form 941 may also be used to claim the COVID-related tax credits. Based upon the foregoing information, CI identified several aspects of fraud relating to claims of the ERC and Sick and Family Leave Wage credits. Together the ERC and sick and family leave wages credit are referred to as the COVID tax credits.

PPP Scheme

31. PETERSON submitted, or caused to be submitted, 5 fraudulent loan applications to various lenders, including Lender 1, Lender 2, Lender 3, Lender 4, Lender 5, and Lender 6 as well as to Company 1, in order to obtain funds through the PPP.

32. Lender 1 [Cross River] is a financial services company based in New Jersey.

33. Lender 2 [Kabbage] is a financial services company based in Georgia.

34. Lender 3 [MBE Capital Partners] is a former financial services company based in New York.

35. Lender 4 [Meridian] is a federally insured financial institution based in Pennsylvania.

36. Lender 5 [ReadyCap Lending] is a financial services company based in New Providence, New Jersey.

37. Lender 6 [Texas National Bank] is a federally insured financial institution based in Edinburg, Texas.

38. Lender 1, Lender 2, Lender 3, Lender 4, Lender 5, and Lender 6 are, and MBE Capital Partners was formerly, authorized by the SBA to participate as PPP lenders to small businesses.

39. Company 1 [Lendio] is financial-technology companies based in Utah, respectively. Company 1 participates in the SBA's PPP by, among other things, acting as a service provider between small businesses and certain lenders. Small businesses seeking PPP loans can apply through Company 1 for PPP loans. Company 1 reviews the loan applications. If a loan application received by Company 1 is approved for funding, a partner lender, such as Lender 1, disburses the loan funds to the applicant.

40. In connection with this fraud, the following PPP loan applications were submitted by PETERSON to PPP lenders:

	Name of Applicant	Name of Business Entity	Amount Sought	Lender	Loan Number	Approx. Date	Status
1.	PETERSON	Caze Motive LLC	\$20,833	Lender 1 [Cross River] and Lender 2 [Kabbage]	5205287908	June 15, 2020	Funded
2.	PETERSON	Operation Restore Inc.	\$41,600	Lender 3 [MBE Capital Partners] and Company 1 [Lendio]	9285198103	July 28, 2020	Funded
3.	PETERSON	Operation Restore Inc.	\$247,915	Lender 3 [MBE Capital Partners] and Lender 4 [Meridian]	4201678705	April 1, 2021	Funded

4.	Angela Peterson	Bringles Broker Inc.	\$119,218	Lender 5 [ReadyCap Lending LLC]	1275708809	April 12, 2021	Funded
5.	PETERSON	Caze Motive LLC	\$229,157	Lender 5 [ReadyCap Lending] and Lender 6 [Texas National Bank]	4036199008	May 21, 2021	Rejected

41. After receiving a total of \$429,566 in PPP loan proceeds, PETERSON used these proceeds for various personal expenses, including for the purchase of properties and vehicles.

Falsified Caze Motive LLC Application to Lender 1 [Cross River]

42. According to bank records, on or about June 15, 2020, Lender 1 received a PPP application in the name of Caze Motive LLC seeking a PPP loan in the amount of \$20,833. The application was submitted in PETERSON's name and represented himself to be the "founder" of Caze Motive LLC, a Texas company.

43. On the application, PETERSON listed phone number (224) 266-0874 and provided a voided check for bank account ending in 9973 at Neighborhood Credit Union for Caze Motive LLC. Neighborhood Credit Union bank records confirmed that bank account ending in 9973 is in PETERSON's name and his phone number is (224) 266-0874.

44. The PPP application submitted to Lender 1 stated that Caze Motive LLC's average monthly payroll was \$8,334 and that the company had 1 employee. As purported documentation of Caze Motive's payroll numbers, the PPP application included a 2019 Form 1120, U.S. Corporation Income Tax Return, for Caze Motive listing \$545,000 in salary and wages. IRS records show the 2019 Form 1120 for Caze Motive was filed on September 18, 2020, after the loan application was filed with Lender 1.

45. The Caze Motive PPP loan application also included a purported Form W-3, Transmittal of Wage and Tax Statements, (Form W-3) for 2019. The Form W-3 claimed that Caze Motive paid \$1,190,000 in wages, tips, and other compensation.

46. The 2019 Form 1120 and Form W-3 for Caze Motive described above lists Caze Motive's business address as 624 N 5th St, Garland, TX 75040.

47. Based upon the information provided to Lender 1 on the Caze Motive application, Lender 1 approved and funded the PPP loan. On or about June 19, 2020, \$20,833 was transferred to Neighborhood Credit Union bank account ending in 0031 held in PETERSON's name.

Evidence that Caze Motive LLC's Application to Lender 1 Was Falsified

48. The government's investigation has indicated that the Caze Motive application to Lender 1 contained false and fraudulent information.

49. As described above, the Caze Motive application submitted an IRS Form 1120 for 2019. IRS records show that the IRS received this tax return on or about September 18, 2020, after it was provided to Lender 1. The 2019 Form 1120 reported that Caze Motive earned income of \$1,032,819, and claimed deductions of \$974,586, for a taxable income of \$58,233. The Form 1120 claimed a deduction for salary and wages of \$545,000 and the entire amount was reported as paid to PETERSON and no other employees. The 2019 Form 1120 for Caze Motive claimed a refund of \$62,836. The refund claimed was attributable to a claimed credit carryover from the 2018 tax year; however, a Form 1120 has not been filed for Caze Motive for the 2018 tax year.

50. Contradictory to the documents provided to Lender 1, Texas Workforce Commission (TWC) records for Caze Motive shows there are 11 employees for each of the 4 quarters in 2019.

51. In addition, PETERSON opened bank account ending in 0031 at Neighborhood Credit Union on or about May 1, 2020; approximately a month before Lender 1 approved and deposited the PPP loan proceeds.

52. Moreover, the loan application claimed that Caze Motive was established in Texas in or around April 1, 2014, and Texas Secretary of State public records confirm that it has been in existence since April 23, 2014, listing PETERSON as the owner. However, IRS records show that no tax filings have been made for Caze Motive prior to the 2019 Form 1120 that was filed on September 18, 2020.

53. The loan application also certified that the applicant, or any owner of the applicant, did not own, or have any common management with, any other business. As described in this Affidavit, however, the investigation reveals that PETERSON was the owner of Caze Motive and numerous other businesses as listed in this affidavit.

Use of Caze Motive LLC PPP Loan Proceeds

54. Bank records show that upon receiving the PPP loan proceeds from Lender 1, PETERSON used the proceeds for various personal expenses.

Falsified Operation Restore Inc. Application to Lender 3 [MBE Capital Partners] and Company 1 [Lendiol]

55. According to bank records, on or about May 29, 2020, Lender 3 received a PPP application in the name of Caze Motive seeking a PPP loan in the amount \$247,900. The application was submitted by PETERSON, as the “founder/owner” of Caze Motive and listed the primary business address as 624 North 5th Street, Garland, TX 75040 and PETERSON’s address as 2223 Bennett Avenue, Apt 216, Dallas, TX 75206. Both addresses were residential addresses used by PETERSON.

56. PETERSON listed the same phone number in the application, (224) 266-0874 in addition to PETERSON's social security number ending in x2149.

57. The PPP application submitted to Lender 3 stated that Caze Motive's average monthly payroll was \$99,167 and that the company had 2 employees. Although the application was made in the name of Caze Motive, the SBA Promissory Note was issued in the business name Operation Restore; a separate entity owned by PETERSON.

58. The PPP loan forgiveness applications shows Operation Restore had 2 employees at the time of the loan application and 5 employees at the time of the forgiveness application, which was dated December 6, 2020.

59. Texas Secretary of State records for Operation Restore show PETERSON as the owner and that the entity was created on May 18, 2020, the same month as the PPP loan application. The records show Operation Restore as a non-profit organization.

60. Based upon the information provided to Lender 3 on the PPP application, on July 28, 2020, Lender 3 approved and funded the PPP loan for Operation Restore for \$41,600. On or about August 5, 2020, \$41,600 was transferred to a bank account ending in 9973 held in Operation Restore's name at Neighborhood Credit Union.

Evidence that Operation Restore Inc.'s Application to Lender 3 and Company 1 Was Falsified

61. The government's investigation has indicated that the Operation Restore application to Lender 3 contained false and fraudulent information.

62. On or about September 22, 2020, after the filing and receipt of the PPP loan funds, PETERSON filed a 2019 Form 1120S for Operation Restore with the IRS. The 2019 Form 1120S reported that Operation Restore was incorporated on April 15, 2019, and earned total income of \$1,032,819, claimed deductions of \$993,600, for a taxable income of \$39,219. The Form 1120S

claimed a deduction for salary and wages of \$545,000 and the entire amount was reported as paid to PETERSON and no other employees. The 2019 Form 1120S for Operation Restore claimed a refund of \$69,000. The refund claimed was attributable to a claimed credit carryover from the 2018 tax year; however, a Form 1120 for the 2018 tax year has not been filed for Operation Restore, further proving that the business was only created for the purpose of filing for a PPP loan.

63. Further IRS records show, on or about May 15, 2021, PETERSON filed a 2020 Form 1120S reporting total income of \$1,280,476 and deductions of \$1,398,568 resulting in a business loss of \$118,092. As on the 2019 Form 1120S, PETERSON claimed a deduction for salary and wages of \$545,000 for himself as “compensation to officers”. In addition, the tax return shows a deduction of salary and wages amounting to \$645,000; however, no other details are provided.

64. IRS records do not show any Forms W-2 or other income records issued in 2018 or 2019. IRS records show that 3 Forms W-2 were issued for Operation Restore in 2020 showing wages of \$69,620 to PETERSON, \$3,294 in wages to R. Harris (Harris), and \$17,339 in wages to Tyler Peterson, PETERSON’s daughter.

65. Contradictory to the documents provided to Lender 3 and what was listed on the Forms 1120S, TWC records for Operation Restore shows there are no employees for all of 2019 and for the first 2 quarters in 2020. TWC shows 3 employees for the 3rd quarter of 2020, listed as PETERSON, Harris and Tyler Peterson. TWC records for the 4th quarter of 2020 only lists PETERSON and Tyler Peterson.

66. In addition, PETERSON opened bank account ending in 9973 in his name at Neighborhood Credit Union on or about April 30, 2020; approximately a month before PETERSON filed for the PPP loan to Lender 3 and Company 1.

67. Moreover, the Operation Restore application claimed that the business had been in operation as of May 29, 2020, for purposes of the PPP loan. However, public records indicate that Operation Restore was formed as a non-profit company in Texas, on or about May 18, 2020, mere days before the loan application. In addition, there are no IRS records that were filed for Operation Restore prior to the PPP loan application date. Bank records for Neighborhood Credit Union account ending in 9973, where the PPP loan was deposited from Lender 3, was opened approximately a month before the loan application, on April 30, 2020. TWC records indicate that there were no employees until the 3rd quarter of 2020 and PETERSON and his daughter were 2 out of the 3 employees named.

68. These records all support that PETERSON created the business Operation Restore for the purpose of fraudulently applying for and receiving the PPP loan from Lender 3.

Use of Operation Restore Inc. PPP Loan Proceeds

69. Bank records show that upon receiving the PPP loan proceeds from Lender 3, PETERSON withdrew large amounts in cash and used the proceeds for various personal expenses.

Falsified Operation Restore Inc. Application to Lender 3 [MBE Capital Partners] and Lender 4 [Meridian]

70. According to bank records, on or about April 5, 2021, Lender 3 [MBE Capital Partners] received a PPP application in the name of Operation Restore seeking a PPP loan in the amount \$247,915. The application was submitted by PETERSON, as the “president”, and listed the primary business address as 1910 Pacific Ave, Ste 6060, Dallas, TX 75201 and PETERSON’s address as 2223 Bennett Avenue, Apt 216, Dallas, TX 75206.

71. The PPP application submitted to Lender 3 and 4 stated that Operation Restore’s average monthly payroll was \$99,166.67 and that it had 11 employees. As documentation for the

PPP loan, PETERSON provided Lender 3 and 4, purported tax returns and bank statements for Operation Restore.

72. PETERSON provided Lender 3 and 4 a copy of a 2019 Form 1120S for Operation Restore along with all 4 quarter Forms 941, Employer's Quarterly Federal Tax Return for 2020. The 1st through 4th quarter Forms 941 PETERSON provided to Lender 3 and 4 each show Operation Restore had 11 employees and wages of \$279,500.

73. However, IRS records do not show that Operation Restore filed any Forms 941 for the 1st or 2nd quarter of 2020. The Form 941 for the 3rd quarter of 2020 filed with the IRS shows 0 employees and wages of \$30,984.56 and the 4th quarter shows 2 employees and wages of \$59,270.01. Therefore, PETERSON clearly created and provided fraudulent Forms 941 for all 4 quarters of 2020 to Lender 3 and 4 to apply for the PPP loan.

74. In addition, in order to secure the PPP loan with Lender 3 and 4, PETERSON provided bank statements from Neighborhood Credit Union for December 19, 2019, through December 31, 2019, for account ending in 9973. The bank statements show an ending balance of \$512,918 on December 31, 2019. The bank records show payments to Quickbooks, BCBS, and Boxer Property. Records from Neighborhood Credit Union indicate PETERSON opened bank account 9973 in 2020, not 2019 as PETERSON fabricated on the documents, he provided to Lender 3 and 4 to secure the PPP loan.

75. Based upon the information provided to Lender 3 and 4 on the Operation Restore application, Lender 3 and 4 approved the PPP loan. The promissory note for this PPP loan, which identified Lender 3 as the lender, was signed by PETERSON. On or about April 9, 2021, \$247,915 was transferred to a bank account ending in 9973 held in PETERSON's name at Neighborhood Credit Union.

Evidence that Operation Restore Inc.'s Application to Lender 3 and 4 Was Falsified

76. The government's investigation has indicated that the Operation Restore application to Lender 3 and 4 contained false and fraudulent information.

77. As described above, the Operation Restore PPP loan application included IRS Forms 941 for the 1st through 4th quarters of 2020. Information obtained from the IRS shows that the IRS has no record of Forms 941 being filed for the 1st and 2nd quarters of 2020 and the Forms 941 for the 3rd and 4th quarters of 2020 provided to the bank were not the same returns filed with the IRS.

78. The Neighborhood Credit Union bank statements for December 1, 2019, through December 31, 2019 provided to Lender 3 and 4 to support the PPP loan application were falsified to show, disbursements to Quickbooks for payroll expenses, BCBS (Blue Cross Blue Shield) to show insurance payments, and to an entity called "Boxer Property" for the lease of office space. While PETERSON did own this bank account, authentic Neighborhood Credit Union bank records obtained in the investigation reveal that this account was created on or about April 30, 2020, after the fabricated bank statements purported; and in actuality reflects materially different disbursements, including the use of PPP loan proceeds from various financial institutions for personal expenses.

79. Records provided by Lender 3 showed the loan application was filed from IP address 70.114.112.203. Charter Communication records on IP address 70.114.112.203 revealed K. Davis (Davis) as the subscriber from October 11, 2020, to January 11, 2022, with billing address 2323 N Akard St, Apt 2407, Dallas, TX 75201. IP address 70.114.112.203 was also used to file other PPP loan applications and tax returns for PETERSON's businesses, Caze Motive and Operation Restore.

Use of Operation Restore Inc. PPP Loan Proceeds

80. Bank records show that upon receiving the PPP loan proceeds from Lender 3 and 4, PETERSON used the proceeds for various personal expenses, including \$23,322.65 to Infiniti Financial to pay off his Infiniti Q50 VIN, \$25,000 to Sydni Peterson for “school” and \$25,000 to Tyler Peterson.

Falsified Bringles Broker LLC Application to Lender 5 [ReadyCap Lending]

81. According to bank records, on or about April 12, 2021, Lender 5 [ReadyCap Lending] received a PPP application in the name of Bringles Broker seeking a PPP loan in the amount \$119,218. The application was submitted by A. Peterson, a potential relative of PETERSON’s, as the “owner”, and listed her address as 2223 Bennett Avenue, Apt 216, Dallas, TX 75206. This address is a known address used by PETERSON.

82. The PPP application submitted to Lender 5 stated that Bringles Broker’s average monthly payroll was \$65,417 and that it had 8 employees. As documentation for the PPP loan, Lender 5 was provided purported tax returns and bank statements for Bringles Broker.

83. Lender 5 was provided with a copy of a 2019 Form 1120 for Bringles Broker along with all 4 quarter Forms 941, Employer’s Quarterly Federal Tax Return for 2019 listing PETERSON as the “owner”. The 1st through 4th quarter Forms 941 provided to Lender 5 each show Bringles Broker had 9 employees and wages of \$136,250.

84. The 2019 Form 1120 for Bringles Broker filed with IRS appears to be the same tax return provided to Lender 5, listing PETERSON as 100% owner. However, IRS records do not show that Bringles Broker filed any Forms 941 in 2019. Therefore, PETERSON clearly created and provided fraudulent Forms 941 for all 4 quarters of 2019 to Lender 5 to apply for the PPP loan.

85. In addition, in order to secure the PPP loan with Lender 5, PETERSON provided bank statements from Neighborhood Credit Union for February 1, 2020, through February 29, 2020, for account ending in 9973. The bank statements show an ending balance of \$81,607.40 on February 29, 2020. The bank records show business name Bringles Broker with payments to Clear Channel, Rent, Quick Book, and BCBS. Records from Neighborhood Credit Union indicate PETERSON opened bank account 9973 in April of 2020 with the business name Caze Motive, not February of 2020 with business name Bringles Broker as PETERSON fabricated on the documents, he provided to Lender 5 to secure the PPP loan.

86. PETERSON also provided Lender 5 with a copy of a voided check from Bringles Broker, First Convenience Bank, but the check lists routing number 311079270 with account ending in 9973, which is the routing number for Neighborhood Credit Union and PETERSON's bank account for Caze Motive.

87. Based upon the information provided to Lender 5 on the Bringles Broker application, Lender 5 approved the PPP loan. The promissory note for this PPP loan, which identified Lender 5 as the lender, was signed by PETERSON. On or about April 15, 2021, \$119,218 was deposited to a bank account ending in 0000 held in PETERSON's name at Neighborhood Credit Union.

Evidence that Bringles Broker LLC's Application to Lender 5 Was Falsified

88. The government's investigation has indicated that the Bringles Broker application to Lender 5 contained false and fraudulent information.

89. Texas Secretary of State records on Bringles Broker shows it was created on May 9, 2017, with address PO Box 601541, Dallas, TX 75360, listing Angela Peterson as the owner. Further, records show that the entities existence was forfeited on February 28, 2020, over a year prior to the loan application filing.

90. IRS records on Bringles Broker show that there were no Forms W-2 issued to any employees for tax years 2019, although the fictitious loan application to Lender 5 indicated that Bringles Broker had 8 employees.

91. As described above, the Bringles Broker PPP loan application included IRS Forms 941 for the 1st through 4th quarters of 2019. IRS has no record of Forms 941 being filed for any of the quarters in 2019; therefore, the Forms 941 provided to Lender 5 are fraudulent and created for the purpose of justifying the PPP loan.

92. As previously stated, the Neighborhood Credit Union bank statements for February 1, 2020, through February 29, 2020, provided to Lender 5 to support the PPP loan application were falsified to show, disbursements to Quickbooks for payroll expenses, BCBS to show insurance payments, and rent. While PETERSON did own this bank account, authentic Neighborhood Credit Union bank records obtained in the investigation reveal that this account was created on or about April 30, 2020, after the fabricated bank statements purported; and in actuality reflects materially different disbursements, including the use of PPP loan proceeds from various financial institutions for personal expenses.

93. The voided check PETERSON provided to Lender 5 for Bringles Broker, showed First Convenience Bank, but the check was altered to include the routing number and account ending in 9973 for Neighborhood Credit Union. PETERSON provided an altered voided check in order to conceal the location PETERSON was directing the PPP loan deposit; into a bank account he owned and controlled.

94. Records provided by Lender 5 showed the loan application was filed from IP address 70.114.112.203, the same IP address used to file PPP loan application to Lender 3 and 4 for Operation Restore. As previously stated, Charter Communication records on IP address

70.114.112.203 revealed Davis as the subscriber from October 11, 2020, to January 11, 2022, with billing address 2323 N Akard St, Apt 2407, Dallas, TX 75201.

95. Although Angela Peterson's name is related to the business ownership, based on the IP address, fabricated tax returns and bank statements provided to Lender 5, and receipt of the PPP loan proceeds, PETERSON clearly filed the PPP loan application to Lender 5.

Use of Bringles Broker LLC PPP Loan Proceeds

96. Bank records show that upon receiving the PPP loan proceeds from Lender 5, into PETERSON's Neighborhood Credit Union account ending in 0000, PETERSON used the proceeds for various personal expenses, including a payment for \$15,842.14 to Bob Stalling Hyundai for the purchase of 2021 Hyundai Sonata (VIN: 5NPEH4J28MH121020).

Falsified Caze Motive LLC Application to Lender 5 [ReadyCap Lending] and Lender 6 [Texas National Bank]

97. According to bank records, on or about May 21, 2021, Lender 5 and 6 received a PPP application in the name of Caze Motive LLC seeking a PPP loan in the amount of \$229,157. The application was submitted in PETERSON's name and represented himself to be the "owner" of Caze Motive.

98. On the application, PETERSON listed phone number (224) 266-0874 and provided a voided check for bank account ending in 9973 at Neighborhood Credit Union for Caze Motive LLC. Neighborhood Credit Union bank records confirmed that bank account ending in 9973 is in PETERSON's name and his phone number is (224) 266-0874.

99. The PPP application submitted to Lender 5 and 6 stated that Caze Motive's average monthly payroll was \$97,250 and that the company had 4 employees. As purported documentation

of Caze Motive's payroll numbers, the PPP application included a 2019 Form 1120, U.S. Corporation Income Tax Return, for Caze Motive listing \$545,000 in salary and wages.

100. In addition to the application, PETERSON provided Lender 5 and 6 with Caze Motive's Forms 941 for the 1st through 4th quarters of 2019 and the 1st quarter Form 941 for 2020; each listing 11 employees and wages of \$297,500.

101. PETERSON also provided Lender 5 and 6 with bank statements from Neighborhood Credit Union account ending in 9973 for January 1, 2019, through January 31, 2019, and February 1, 2020, through February 29, 2020. The bank statements show withdrawals for Clear Channel, Quickbooks, BCBS, and rent.

102. Based upon the information provided to Lender 5 and 6, the lenders denied the PPP loan.

Evidence that Caze Motive LLC's Application to Lender 5 and 6 Was Falsified

103. The government's investigation has indicated that the Caze Motive application to Lender 5 and 6 contained false and fraudulent information.

104. IRS records indicate that PETERSON was the only employee that received a Form W-2 from Caze Motive for 2018 through 2021, contradictory to the PPP loan application that Caze Motive had 4 employees.

105. Authentic Neighborhood Credit Union bank records for account ending in 9973 obtained in the investigation reveal that this account was created on or about April 30, 2020, after the fabricated bank statements purported; and in actuality reflects materially different disbursements, including the use of PPP loan proceeds from various financial institutions for personal expenses.

106. Records provided by Lender 5 showed the loan application was filed from IP address 70.114.112.203, the same IP used to file the PPP loan applications for Operation Restore with Lenders 3 and 4, and the PPP loan application for Bringles Broker with Lender 5. As previously stated, Charter Communication records on IP address 70.114.112.203 revealed Davis is the subscriber from October 11, 2020, to January 11, 2022, with billing address 2323 N Akard St, Apt 2407, Dallas, TX 75201.

107. The loan application also certified that the applicant, or any owner of the applicant, did not own, or have any common management with, any other business. As described in this Affidavit, however, the investigation reveals that PETERSON was the owner of Caze Motive and numerous other businesses as listed in this affidavit.

108. Four out of 5 of the PPP loan applications are signed by PETERSON certifying that he intended to use the proceeds of the loan for payroll costs and that no part of the proceeds would be used for personal, family, or household purposes. The loan application in the name of Angela Peterson is believed to have been filed by PETERSON using her name based on the IP address used to file the application, the fraudulent tax returns in PETERSON's name, the fabricated bank statements with PETERSON's account information, and PETERSON's use of the PPP loan proceeds. As described in this Affidavit, however, the investigation reveals that PETERSON created Caze Motive and Operation Restore and used the business Bringles Broker for the purposes of fraudulently filing PPP loan applications and that true business operations and employees did not exist.

Fraudulent Tax Scheme

109. As previously stated, PETERSON used his fictitious businesses to file fraudulent Forms 941 with the IRS claiming fraudulent COVID-19 related tax credits for qualified sick and family leave wages and the employee retention credit for tax periods 2020, 2021, and 2022. PETERSON filed the fraudulent Forms 941 under the business names Caze Motive, Caze and Myers Consultants, Operation Lending Hand, Grabba Car, and Bringles Auto Brokers.

Fraudulent Forms 941 for Caze Motive LLC

110. Between February 7, 2021, and January 20, 2023, PETERSON filed electronic Forms 941 for Caze Motive for the 2nd - 4th quarters of 2020, and 1st, 3rd, and 4th quarters of 2021, and all 4 quarters of 2022. Each of the Forms 941 claimed Caze Motive had between 11 to 15 employees, reported taxes due as a result of the wages paid, and claimed the COVID refundable credits for the employee retention credit and qualified sick and family leave wages.

111. On February 7, 2021, PETERSON filed Form 941 for Caze Motive for the 2nd quarter of 2020. The Form 941 falsely claimed 11 employees, ERC amounting to \$6,875, and Sick and Family Leave Wage Credit amounting to \$137,656.62, claiming a refund of \$47,935.46 and ultimately resulting in IRS issuing a refund of \$41,268.09.

112. On February 7, 2021, PETERSON filed Form 941 for Caze Motive for the 3rd quarter of 2020. The Form 941 falsely claimed 11 employees, ERC amounting to \$6,875, and Sick and Family Leave Wage Credit amounting to \$137,656.62, claiming a refund of \$47,953.44 and ultimately resulting in IRS issuing a refund of \$47,953.44.

113. On February 7, 2021, PETERSON filed Form 941 for Caze Motive for the 4th quarter of 2020. The Form 941 falsely claimed 11 employees, ERC amounting to \$6,875, and Sick

and Family Leave Wage Credit amounting to \$137,656.62, claiming a refund of \$47,953.44 and ultimately resulting in IRS issuing a refund of \$47,953.44.

114. On April 1, 2021, PETERSON filed Form 941 for Caze Motive for the 1st quarter of 2021. The Form 941 falsely claimed 11 employees, ERC amounting to \$8,573.60, and Sick and Family Leave Wage Credit amounting to \$136,424.61, claiming a refund of 48,942.03 and ultimately resulting in IRS issuing a refund of \$39,856.73.

115. On December 25, 2021, PETERSON filed Form 941 for Caze Motive for the 3rd quarter of 2021. The Form 941 falsely claimed 11 employees, ERC amounting to \$53,305.35 and Sick and Family Leave Wage Credit amounting to \$110,337.15, claiming a refund of \$71,378.07 and ultimately resulting in IRS issuing a refund of \$71,126.52.

116. On January 11, 2022, PETERSON filed Form 941 for Caze Motive for the 4th quarter of 2021. The Form 941 falsely claimed 11 employees, ERC amounting to \$64,403.51 and Sick and Family Leave Wage Credit amounting to \$92,013.24, claiming a refund of \$64,168.99 and ultimately resulting in IRS issuing a refund of \$64,168.99.

117. On April 1, 2022, PETERSON filed Form 941 for Caze Motive for the 1st quarter of 2022. The Form 941 falsely claimed 11 employees, Sick and Family Leave Wage Credit amounting to \$174,418.12, claiming a refund of \$82,801.57 and ultimately resulting in IRS issuing a refund of \$82,801.57.

118. On July 6, 2022, PETERSON filed Form 941 for Caze Motive for the 2nd quarter of 2022. The Form 941 falsely claimed 15 employees, Sick and Family Leave Wage Credit amounting to \$205,694.02, claiming a refund of \$113,345.88 and ultimately resulting in IRS issuing a refund of \$106,006.25.

119. On October 2, 2022, PETERSON filed Form 941 for Caze Motive for the 3rd quarter of 2022. The Form 941 falsely claimed 15 employees, Sick and Family Leave Wage Credit amounting to \$221,355.30, claiming a refund of \$128,783.95 and ultimately resulting in IRS issuing a refund of \$129,295.35.

120. On January 20, 2023, PETERSON filed Form 941 for Caze Motive for the 4th quarter of 2022. The Form 941 falsely claimed 15 employees, Sick and Family Leave Wage Credit amounting to \$231,955.89, claiming a refund of \$139,359.74 and ultimately resulting in IRS issuing a refund of \$139,359.74.

121. In total, PETERSON filed 10 fraudulent Forms 941 for Caze Motive claiming \$1,732,075.65 in COVID credits. On each of the Forms 941, these credits reduced the tax liability and resulted in refunds. Therefore, rather than paying a total of \$939,453.08 in taxes due for these 10 tax periods, PETERSON claimed refunds totaling \$792,622.57 and IRS issued \$769,790.12 in refunds.

Evidence that Caze Motive LLC's Forms 941 filed with the IRS are Fraudulent

122. As previously stated, Texas Secretary of State public records state that Caze Motive has been in existence since April 23, 2014. However, IRS records show that no filings have been made for Caze Motive prior to the 2019 Form 1120 that was filed on September 18, 2020.

123. Inconsistent with the Forms 941 that were filed showing 11 to 15 employees, IRS records show that PETERSON is the only employee that has received a Form W-2, Wage and Tax Statement ("Form W-2"), from Caze Motive for 2020 and 2021. PETERSON's Form W-2 reflects wages of \$595,000 for 2020, \$347,276 for 2021, and \$605,073 for 2022. In 2022, a Form W-2 was also issued to PETERSON's daughter, Tyler Peterson, for \$247,276.

124. In addition, Texas Workforce Commission (TWC) records for Caze Motive shows there are 3 employees for the first 3 quarters of 2020, zero employees for 2021, and zero employees for 2022. The 3 employees listed in 2020 are PETERSON, Tyler Peterson, and R. Harris, an unknown individual.

125. IRS records do not show Caze Motive received any income documents between 2020 and 2022, indicating that as a business it did not earn income, as a typical business would. IRS records also do not show any tax deposits made for Caze Motive.

126. PETERSON filed the Forms 941 for the 2nd, 3rd, and 4th quarters of 2020 all on February 7, 2021, indicating that the tax returns were being filed for the mere purpose of receiving the Covid employer credits and claiming a refund.

127. Texas Secretary of State records, IRS records, and TWC records all support the fact that Caze Motive is a fictitious business and PETERSON claimed to have fictitious employees for the purpose of claiming fraudulent Covid credits on the Forms 941 filed with the IRS. The fraudulent Forms 941 filed with the IRS generated a total of \$792,622.57 in refunds claimed and \$769,790.12 in refunds issued by the IRS.

Refund Details and Use of Caze Motive LLC Fraudulent Form 941 Proceeds

128. The fraudulent Form 941 filed for the 2nd quarter of 2020 for Caze Motive generated a Treasury refund check amounting to \$47,935.46 issued on July 27, 2021. PETERSON deposited the Treasury check at NBKC bank into account ending in 2309; however, the bank returned the check to IRS due to fraud. On November 2, 2021, after adjustments, IRS reissued the check for \$41,268.09 and PETERSON cashed the check at PLS check cashing on December 27, 2021.

129. The fraudulent Form 941 filed for the 3rd quarter of 2020 for Caze Motive generated a Treasury refund check amounting to \$47,953.44 issued on March 9, 2021. PETERSON deposited the Treasury check at Neighborhood Credit Union into account ending in 9973. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

130. The fraudulent Form 941 filed for the 4th quarter of 2020 for Caze Motive generated a Treasury refund check amounting to \$47,953.44 issued on July 27, 2021. PETERSON deposited the Treasury check at NBKC bank into account ending in 2309; however, the bank returned the check to IRS due to fraud. On November 2, 2021, IRS reissued the check for \$47,953.44 and PETERSON cashed the check at PLS check cashing on January 19, 2022.

131. The fraudulent Form 941 filed for the 1st quarter of 2021 for Caze Motive generated a Treasury refund check amounting to \$39,856.73 issued on May 25, 2021. PETERSON deposited the Treasury check at Neighborhood Credit Union into account ending in 9973. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

132. The fraudulent Form 941 filed for the 3rd quarter of 2021 for Caze Motive generated a Treasury refund check amounting to \$71,126.52 issued on January 18, 2022. PETERSON cashed the check at PLS check cashing on February 7, 2022.

133. The fraudulent Form 941 filed for the 4th quarter of 2021 for Caze Motive generated a Treasury refund check amounting to \$64,168.99 issued on February 22, 2022. PETERSON deposited the Treasury check at Bank of America into Caze Motive account ending in 6857 on February 28, 2022. On March 2, 2022, PETERSON wired \$30,000 from Bank of America account ending in 6857 to Bachman Auto Group Inc. (Bachman Auto) with a note

showing “balance vett”. Records received from Bachman Auto via subpoena show PETERSON and Davis purchased a 2022 Corvette on February 17, 2022, for \$139,717. The remaining funds that were deposited from the refund, PETERSON made several transfers between his bank accounts and used the proceeds for various personal expenses. Additional vehicle records indicate that PETERSON no longer owns the 2022 Corvette.

134. The fraudulent Form 941 filed for the 1st quarter of 2022 for Caze Motive generated a Treasury refund check amounting to \$82,801.57 issued on May 24, 2022. PETERSON deposited the Treasury check at Wells Fargo into Caze Motive account ending in 1770 on June 13, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

135. The fraudulent Form 941 filed for the 2nd quarter of 2022 for Caze Motive generated a Treasury refund check amounting to \$106,006.25 issued on August 23, 2022. PETERSON deposited the Treasury check at Bank of Texas (BOKF) into Caze Motive account ending in 7118 on September 16, 2022. On the same day, September 16, 2022, PETERSON transferred of \$108,450 to BOKF account ending in 9493. BOKF bank records for account ending in 9493 shows a wire to Bayou Title Inc., West Bank Escrow (Bayou Title) for \$193,000 on September 16, 2022. Bank records also show a cashier’s check for \$107,000 made out to Bayou Title dated September 17, 2022. Records received from Bayou Title via subpoena show PETERSON used the \$193,000 wire and cashier’s check for \$107,000 as a portion of the down payment for the purchase of a residence located at 13397 Highway 1077, Folsom, LA 70437.

136. The fraudulent Form 941 filed for the 3rd quarter of 2022 for Caze Motive generated a Treasury refund check amounting to \$129,295.35 issued on December 20, 2022.

PETERSON deposited the Treasury check at BOKF into Caze Motive account ending in 7118 on December 23, 2022. PETERSON then made several transfers between his bank accounts.

137. The fraudulent Form 941 filed for the 4th quarter of 2022 for Caze Motive generated a Treasury refund check amounting to \$139,359.74 issued on March 14, 2023. PETERSON deposited the Treasury check at BOKF into Caze Motive account ending in 7118 on March 17, 2023. BOKF bank records for account ending in 7118 shows a wire to Trieu Law, LLC for \$96,500 on March 23, 2023. The purpose of this purchase is unknown; however, the website for Trieu Law indicates that the firm specializes in “domestic, civil, and criminal law as well as property and auto title transfers” in the New Orleans area. With the remaining funds, PETERSON made several transfers between his bank accounts.

138. The IRS generated at least 10 refunds to Caze Motive totaling \$769,790.12 in the form of Treasury checks. The Treasury checks were mailed to PO Box 601541, Dallas, TX 75360, in the Northern District of Texas.

Fraudulent Forms 941 for Caze & Myers Consultants Inc.

139. Between January 11, 2022, and January 23, 2023, PETERSON filed electronic Forms 941 for Caze & Myers Consultants Inc. for the 3rd and 4th quarters of 2021, all 4 quarters of 2022. Each of the Forms 941 claimed Caze & Myers Consultants had between 5 to 15 employees, reported taxes due as a result of the wages paid, and claimed the COVID refundable credits for the employee retention credit and qualified sick and family leave wages.

140. On January 11, 2022, PETERSON filed Form 941 for Caze & Myers Consultants for the 3rd quarter of 2021. The Form 941 falsely claimed 5 employees and ERC amounting to

\$36,167.78, claiming a refund of \$11,427.54 and ultimately resulting in IRS issuing a refund of \$9,252.19.

141. On January 11, 2022, PETERSON filed Form 941 for Caze & Myers Consultants for the 4th quarter of 2021. The Form 941 falsely claimed 5 employees, ERC amounting to \$37,027.20, and Sick and Family Leave Wage Credit amounting to \$3,940.58, claiming a refund of \$16,227.54 and ultimately resulting in IRS issuing a refund of \$16,227.54.

142. On April 1, 2022, PETERSON filed Form 941 for Caze & Myers Consultants for the 1st quarter of 2022. The Form 941 falsely claimed 11 employees and Sick and Family Leave Wage Credit amounting to \$189,340.47, claiming a refund of \$97,723.92 and ultimately resulting in IRS issuing a refund of \$97,723.92.

143. On July 6, 2022, PETERSON filed Form 941 for Caze & Myers Consultants for the 2nd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$206,770.74, claiming a refund of \$114,464.24 and ultimately resulting in IRS issuing a refund of \$114,464.24.

144. On October 2, 2022, PETERSON filed Form 941 for Caze & Myers Consultants for the 3rd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$220,626.16, claiming a refund of \$128,095.94 and ultimately resulting in IRS issuing a refund of \$128,604.70.

145. On January 23, 2023, PETERSON filed Form 941 for Caze & Myers Consultants for the 4th quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$223,875.49, claiming a refund of \$131,378.22 and ultimately resulting in IRS issuing a refund of \$131,378.22.

146. In total, PETERSON filed 6 fraudulent Forms 941 for Caze & Myers Consultants claiming \$917,748.42 in COVID credits. On each of the Forms 941, these credits reduced the tax liability and resulted in refunds. Therefore, rather than paying a total of \$418,431.02 in taxes due for these 6 tax periods, PETERSON claimed refunds totaling \$499,317.40 and IRS issued \$497,650.81 in refunds.

Evidence that Caze & Myers Consultants Forms 941 filed with the IRS are Fraudulent

147. Texas Secretary of State public records state that Caze & Myers Consultants has been in existence since July 14, 2022; over a year after PETERSON started filing Forms 941 for this company. A search for TWC records for Caze and Myers Consultants yielded no results. These records, or lack thereof, are indicators that the business did not operate as a true business and was just used for the purpose of filing fraudulent Form 941 tax returns.

148. Inconsistent with the Forms 941 that were filed showing 5 to 15 employees, per IRS records, Forms W-2 have never been issued for any employees of Caze and Myers Consultants for 2019 through 2022. There were no tax returns filed for Caze and Myers Consultants prior to the 4th quarter of 2020 Form 941 that was filed. In addition, IRS records do not show Caze and Myers Consultants received any income documents between 2019 and 2022, indicating that as a business it did not earn income.

149. The timing of the Texas Secretary of State business records, non-existence of TWC records, and lack of income and employee records from IRS, all support the fact that Caze & Myers Consultants is a fictitious business and PETERSON claimed to have fictitious employees for the purpose of claiming fraudulent Covid credits on the Forms 941 filed with the IRS. The fraudulent

Forms 941 filed with the IRS generated a total of \$499,317.40 in refunds claimed and \$497,650.81 in refunds issued by the IRS.

Refund Details and Use of Caze and Myers Consultants Inc. Fraudulent Form 941 Proceeds

150. The fraudulent Form 941 filed for the 3rd quarter of 2021 for Caze and Myers Consultants generated a Treasury refund check amounting to \$9,252.19 issued on February 8, 2022. PETERSON cashed the check at PLS check cashing on February 28, 2022.

151. The fraudulent Form 941 filed for the 4th quarter of 2021 for Caze and Myers Consultants generated a Treasury refund check amounting to \$16,227.54 issued on February 22, 2022. PETERSON deposited the Treasury check at BOKF into Caze & Myers Consultants account ending in 0022 on July 19, 2022. Two days after this deposit, on July 21, 2022, PETERSON made a cashier's check for \$10,000 to Pennant Real Estate.

152. The fraudulent Form 941 filed for the 1st quarter of 2022 for Caze and Myers Consultants generated a Treasury refund check amounting to \$97,723.92 issued on May 24, 2022. PETERSON deposited the Treasury check at BOKF into Caze & Myers Consultants account ending in 5471 on July 19, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

153. The fraudulent Form 941 filed for the 2nd quarter of 2022 for Caze and Myers Consultants generated a Treasury refund check amounting to \$114,464.24 issued on August 23, 2022. PETERSON deposited the Treasury check at BOKF into Caze & Myers Consultants account ending in 5471 on August 26, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

154. The fraudulent Form 941 filed for the 3rd quarter of 2022 for Caze and Myers Consultants generated a Treasury refund check amounting to \$128,604.70 issued on December 20, 2022. PETERSON deposited the Treasury check at BOKF into Caze & Myers Consultants account ending in 5471 on December 27, 2022. PETERSON then made several transfers between his bank accounts.

155. The fraudulent Form 941 filed for the 4th quarter of 2022 for Caze and Myers Consultants generated a Treasury refund check amounting to \$131,378.22 issued on March 14, 2023. PETERSON deposited the Treasury check at BOKF into Caze & Myers Consultants account ending in 5471 on March 20, 2023. PETERSON then made several transfers between his bank accounts.

156. The IRS generated at least 6 refunds to Caze and Myers Consultants totaling \$497,650.81 in the form of Treasury checks. The Treasury checks were mailed to PO Box 601541, Dallas, TX 75360, in the Northern District of Texas.

Fraudulent Forms 941 for Operation Lending Hand Inc.

157. Between January 11, 2022, and January 27, 2023, PETERSON filed electronic Forms 941 for Operation Lending Hand Inc. for the 3rd and 4th quarters of 2021 and all 4 quarters of 2022. Each of the Forms 941 claimed Operation Lending Hand had between 5 to 15 employees, reported taxes due as a result of the wages paid, and claimed the COVID refundable credits for the employee retention credit and qualified sick and family leave wages.

158. On January 11, 2021, PETERSON filed Form 941 for Operation Lending Hand for the 3rd quarter of 2021. The Form 941 falsely claimed 5 employees, ERC amounting to

\$37,027.20, and Sick and Family Leave Wage Credit amounting to \$3,940.58, claiming a refund of \$16,227.54 and ultimately resulting in IRS issuing a refund of \$14,052.19.

159. On January 11, 2021, PETERSON filed Form 941 for Operation Lending Hand for the 4th quarter of 2021. The Form 941 falsely claimed 5 employees, ERC amounting to \$37,027.20, and Sick and Family Leave Wage Credit amounting to \$3,940.58, claiming a refund of \$16,227.54 and ultimately resulting in IRS issuing a refund of \$16,227.54.

160. On April 1, 2022, PETERSON filed Form 941 for Operation Lending Hand for the 1st quarter of 2022. The Form 941 falsely claimed 11 employees and Sick and Family Leave Wage Credit amounting to \$189,340.47, claiming a refund of \$97,723.92 and ultimately resulting in IRS issuing a refund of \$97,723.92.

161. On July 6, 2022, PETERSON filed Form 941 for Operation Lending Hand for the 2nd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$205,692.94, claiming a refund of \$113,344.80 and ultimately resulting in IRS issuing a refund of \$113,344.80.

162. On October 2, 2022, PETERSON filed Form 941 for Operation Lending Hand for the 3rd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$216,002.61, claiming a refund of \$123,554.44 and ultimately resulting in IRS issuing a refund of \$124,045.75.

163. On January 27, 2023, PETERSON filed Form 941 for Operation Lending Hand for the 4th quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$221,114.41, claiming a refund of \$128,666.78 and ultimately resulting in IRS issuing a refund of \$128,666.78.

164. In total, PETERSON filed 6 fraudulent Forms 941 for Operation Lending Hand claiming \$914,085.99 in COVID credits. On each of the Forms 941, these credits reduced the tax liability and resulted in refunds. Therefore, rather than paying a total of \$418,340.97 in taxes due for these 6 tax periods, PETERSON claimed refunds totaling \$495,745.02 and IRS issued \$494,060.98 in refunds.

Evidence that Operation Lending Hand Forms 941 filed with the IRS are Fraudulent

165. The records from Operation Lending Hand mirrors almost exactly what is shown for Caze & Myers Consultants. Texas Secretary of State public records state that Operation Lending Hand has been in existence since February 23, 2022; after several of the questionable Forms 941 were filed. For years 2019 through 2022, PETERSON did not report wage or employee records to TWC for Operation Lending Hand. These records, or lack thereof, are indicators that the business did not operate as a true business and was just used for the purpose of filing fraudulent Form 941 tax returns.

166. Inconsistent with the Forms 941 that were filed showing 5 to 15 employees, per IRS records, Forms W-2 have never been issued for any employees of Operation Lending Hand for 2019 through 2022. There were no tax returns file for Operation Lending Hand prior to the 4th quarter of 2020 Form 941 that was filed on April 16, 2021. In addition, IRS records do not show Operation Lending Hand received any income documents between 2019 and 2022, indicating that as a business it did not earn income.

167. The timing of the Texas Secretary of State business records, non-existence of TWC records, and lack of income and employee records from IRS, all support the fact that Operation Lending Hand is a fictitious business and PETERSON claimed to have fictitious employees for

the purpose of claiming fraudulent Covid credits on the Forms 941 filed with the IRS. The fraudulent Forms 941 filed with the IRS generated a total of \$495,745.02 in refunds claimed and \$494,060.98 in refunds issued by the IRS.

Refund Details and Use of Operation Lending Hand Fraudulent Form 941 Proceeds

168. The fraudulent Form 941 filed for the 3rd quarter of 2021 for Operation Lending Hand generated a Treasury refund check amounting to \$14,052.19 issued on February 8, 2022. PETERSON deposited the Treasury check at BOKF into Operation Lending Hand account ending in 6678 on May 5, 2022. PETERSON withdrew cash and used the proceeds for various personal expenses.

169. The fraudulent Form 941 filed for the 4th quarter of 2021 for Operation Lending Hand generated a Treasury refund check amounting to \$16,227.54 issued on February 8, 2022. PETERSON deposited the Treasury check at BOKF into Operation Lending Hand account ending in 9501 on May 13, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

170. The fraudulent Form 941 filed for the 1st quarter of 2022 for Operation Lending Hand generated a Treasury refund check amounting to \$97,723.92 issued on May 24, 2022. PETERSON deposited the Treasury check at BOKF into Operation Lending Hand account ending in 6678 on May 27, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

171. The fraudulent Form 941 filed for the 2nd quarter of 2022 for Operation Lending Hand generated a Treasury refund check amounting to \$113,344.80 issued on August 23, 2022. PETERSON deposited the Treasury check at BOKF into Operation Lending Hand account ending

in 6678 on August 26, 2022. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

172. The fraudulent Form 941 filed for the 3rd quarter of 2022 for Operation Lending Hand generated a Treasury refund check amounting to \$124,045.75 issued on December 20, 2022. PETERSON deposited the Treasury check at BOKF into Operation Lending Hand account ending in 6678 on December 23, 2022, through the ATM. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

173. The fraudulent Form 941 filed for the 4th quarter of 2022 for Operation Lending Hand generated a Treasury refund check amounting to \$128,666.78 issued on March 14, 2023. PETERSON deposited the Treasury check at BOKF into Operation Lending Hands account ending in 6678 on March 20, 2023. PETERSON then made several transfers between his bank accounts and used the proceeds for various personal expenses.

174. The IRS generated at least 6 refunds to Operation Lending Hand totaling \$494,060.98 in the form of Treasury checks. The Treasury checks were mailed to PO Box 601541, Dallas, TX 75360, in the Northern District of Texas.

Fraudulent Forms 941 for Grabba Car Inc.

175. Between May 3, 2022, and January 2, 2023, PETERSON filed electronic Forms 941 for Grabba Car for the 4th quarters in 2021 and all 4 quarters of 2022. Each of the Forms 941 claimed Grabba Car had 15 employees, reported taxes due as a result of the wages paid, and claimed the COVID refundable credits for the employee retention credit and qualified sick and family leave wages.

176. On May 3, 2022, PETERSON filed Form 941 for Grabba Car for the 4th quarter of 2021. The Form 941 falsely claimed 15 employees, ERC amounting to \$50,000, and Sick and Family Leave Wage Credit amounting to \$152,901.97, claiming a refund of \$111,285.42 and ultimately resulting in IRS issuing a refund of \$111,285.42.

177. On June 17, 2022, PETERSON filed Form 941 for Grabba Car for the 1st quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$189,470.10, claiming a refund of \$97,627.76 and ultimately resulting in IRS issuing a refund of \$91,419.32.

178. On July 6, 2022, PETERSON filed Form 941 for Grabba Car for the 2nd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$207,866.19, claiming a refund of \$115,517.49 and ultimately resulting in IRS issuing a refund of \$115,517.49.

179. On October 2, 2022, PETERSON filed Form 941 for Grabba Car for the 3rd quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$220,966.97, claiming a refund of \$128,377.48 and ultimately resulting in IRS issuing a refund of \$128,887.32.

180. On January 2, 2023, PETERSON filed Form 941 for Grabba Car for the 4th quarter of 2022. The Form 941 falsely claimed 15 employees and Sick and Family Leave Wage Credit amounting to \$224,377.38, claiming a refund of \$131,824.45 and ultimately resulting in IRS issuing a refund of \$131,824.45.

181. In total, PETERSON filed 5 fraudulent Forms 941 for Grabba Car claiming \$1,045,582.61 in COVID credits. On each of the Forms 941, these credits reduced the tax liability and resulted in refunds. Therefore, rather than paying a total of \$460,950.01 in taxes due for these

5 tax periods, PETERSON claimed refunds totaling \$584,632.60 and IRS issued \$578,934 in refunds.

Evidence that Grabba Car Forms 941 filed with the IRS are Fraudulent

182. Texas Secretary of State public records state that Grabba Car has been in existence since June 9, 2022; after several of the questionable Forms 941 were filed. For years 2019 through 2022, PETERSON did not report wage or employee records to TWC for Grabba Car. These records, or lack thereof, are indicators that the business did not operate as a true business and was just used for the purpose of filing fraudulent Form 941 tax returns.

183. Inconsistent with the Forms 941 that were filed showing 15 employees, per IRS records, Forms W-2 have never been issued for any employees of Grabba Car for 2019 through 2022. There were no tax returns filed for Grabba Car prior to the 2nd quarter of 2021 Form 941 that was filed on September 22, 2021. In addition, IRS records do not show Grabba Car received any income documents between 2019 and 2022, indicating that as a business it did not earn income.

184. The timing of the Texas Secretary of State business records, non-existence of TWC records, and lack of income and employee records from IRS, all support the fact that Grabba Car is a fictitious business and PETERSON claimed to have fictitious employees for the purpose of claiming fraudulent Covid credits on the Forms 941 filed with the IRS. The fraudulent Forms 941 filed with the IRS generated a total of \$584,632.60 in refunds claimed and \$578,934 in refunds issued by the IRS.

Refund Details and Use of Grabba Car Fraudulent Form 941 Proceeds

185. The fraudulent Form 941 filed for the 4th quarter of 2021 for Grabba Car generated a Treasury refund check amounting to \$111,285.42 issued on June 7, 2022. PETERSON deposited the Treasury check at Comerica into account ending in 9451 on June 13, 2022. PETERSON withdrew cash, made transfers to other accounts he owns, and used the proceeds for various personal expenses.

186. The fraudulent Form 941 filed for the 1st quarter of 2022 for Grabba Car generated a Treasury refund check amounting to \$91,419.32 issued on July 12, 2022. PETERSON deposited the Treasury check at Comerica into account ending in 9451 on June 19, 2022. PETERSON withdrew cash, made transfers to other accounts he owns, and used the proceeds for various personal expenses.

187. The fraudulent Form 941 filed for the 2nd quarter of 2022 for Grabba Car generated a Treasury refund check amounting to \$115,517.49 issued on August 23, 2022. PETERSON deposited the Treasury check at Comerica into account ending in 9451 on August 26, 2022. PETERSON withdrew cash, made transfers to other accounts he owns, and used the proceeds for various personal expenses.

188. The fraudulent Form 941 filed for the 3rd quarter of 2022 for Grabba Car generated a Treasury refund check amounting to \$128,887.32 issued on December 20, 2022. PETERSON deposited the Treasury check at Comerica into account ending in 9451 on December 23, 2022. On December 24, 2022, PETERSON wrote three checks, one to Davis for \$5,000 and two to Eiseman (a jeweler) for \$15,458.25 and \$10,000. On December 27, 2022, PETERSON wrote a check to Sydni PETERSON, listing “school tuition” in the memo line. With the remaining funds, PETERSON withdrew cash, made transfers to other accounts he owns, and used the proceeds for other various personal expenses.

189. The fraudulent Form 941 filed for the 4th quarter of 2022 for Grabba Car generated a Treasury refund check amounting to \$131,824.45 issued on March 14, 2023. PETERSON deposited the Treasury check at Comerica into account ending in 9451 on March 17, 2023. On March 18, 2023, PETERSON wrote a check to Eiseman for \$46,836.77 and withdrew cash, made transfers to other accounts he owns, and used the proceeds for various personal expenses.

190. The IRS generated at least 5 refunds to Grabba Car totaling \$578,934 in the form of Treasury checks. The Treasury checks were mailed to PO Box 601541, Dallas, TX 75360, in the Northern District of Texas.

Fraudulent Forms 941 for Bringles Auto Brokers LLC

191. Between August 26, 2022, and October 5, 2022, electronic Forms 941 for Bringles Auto Brokers for the 1st, 2nd, and 3rd quarters in 2022 were filed with the IRS. Each of the Forms 941 claimed Bringles Auto Brokers had 20 employees, reported taxes due as a result of the wages paid, and claimed the COVID refundable credits for the employee retention credit and qualified sick and family leave wages. All 3 Forms 941 were signed by Angela Peterson.

192. On August 26, 2022, Form 941 for Bringles Auto Brokers was filed with the IRS for the 1st quarter of 2022. The Form 941 falsely claimed 20 employees, Sick and Family Leave Wage Credit amounting to \$224,975.93, claiming a refund of \$132,627.69 and ultimately resulting in IRS issuing a refund of \$117,390.16.

193. Also on August 26, 2022, Form 941 for Bringles Auto Brokers was filed with the IRS for the 2nd quarter of 2022. The Form 941 falsely claimed 20 employees, Sick and Family Leave Wage Credit amounting to \$225,218.82, claiming a refund of \$132,848.86 and ultimately resulting in IRS issuing a refund of \$132,848.86.

194. On October 5, 2022, Form 941 for Bringles Auto Brokers was filed with the IRS for the 3rd quarter of 2022. The Form 941 falsely claimed 20 employees, Sick and Family Leave Wage Credit amounting to \$219,342.25, claiming a refund of \$126,745.93 and ultimately resulting in IRS issuing a refund of \$126,745.93.

195. In total, 3 fraudulent Forms 941 for Bringles Auto Brokers were filed with the IRS claiming \$669,537 in COVID credits. On each of the Forms 941, the credits reduced the tax liability and resulted in refunds. Therefore, rather than paying a total of \$277,314.52 in taxes due for these 3 tax periods, refunds were claimed totaling \$392,222.48 and IRS issued \$376,984.95 in refunds.

Evidence that Bringles Auto Brokers Forms 941 filed with the IRS are Fraudulent

196. Texas Secretary of State public records state that Bringles Auto Brokers has been in existence since September 7, 2022; after the 1st and 2nd quarter Forms 941 were filed. The Certificate of Formation for Bringles Auto Brokers lists Angela Peterson as the registered agent, and both Angela Peterson and PETERSON as “managing members”. However, on October 3, 2022, a Certificate of Correction was filed to correct the Certificate of Formation requesting to delete PETERSON as a managing member of Bringles Auto Brokers. For years 2019 through 2022, wage or employee records were not reported to the IRS. These records, or lack thereof, are indicators that the business did not operate as a true business and was just used for the purpose of filing fraudulent Form 941 tax returns and obtaining refunds.

197. Inconsistent with the Forms 941 that were filed showing 20 employees, per IRS records, Forms W-2 have never been issued for any employees of Bringles Auto Brokers for 2019 through 2022. In addition, IRS records do not show Bringles Auto Brokers received any income documents between 2019 and 2022, indicating that as a business it did not earn income.

198. The timing of the Texas Secretary of State business records and lack of income and employee records from IRS, all support the fact that Bringles Auto Brokers is a fictitious business and PETERSON claimed to have fictitious employees for the purpose of claiming fraudulent Covid credits on the Forms 941 filed with the IRS. The fraudulent Forms 941 filed with the IRS generated a total of \$392,222.48 in refunds claimed and \$376,984.95 in refunds issued by the IRS.

Refund Details and Use of Bringles Auto Brokers Fraudulent Form 941 Proceeds

199. The fraudulent Form 941 filed for the 1st quarter of 2022 for Bringles Auto Brokers generated a Treasury refund check amounting to \$117,390.16 issued on September 20, 2022. Over 6 months later, on April 27, 2023, the Treasury check was deposited through the ATM at BOKF into account ending in 7385, a bank account opened in the name of Bringles Auto Brokers with Angela Peterson as the signer.

200. The fraudulent Form 941 filed for the 2nd quarter of 2022 for Bringles Auto Brokers generated a Treasury refund check amounting to \$132,848.86 issued on September 27, 2022. On April 25, 2023, the Treasury check was deposited through the ATM at BOKF into account ending in 7385.

201. The fraudulent Form 941 filed for the 3rd quarter of 2022 for Bringles Auto Brokers LLC generated a Treasury refund check amounting to \$126,745.93 issued on November 22, 2022. On April 14, 2023, the Treasury check was deposited through the ATM at BOKF into account ending in 7385.

A. Tracing of Proceeds

202. PETERSON disguised the source of the fraudulent funds by moving the proceeds through multiple bank accounts and by conducting multiple financial transactions; however,

ultimately most of the funds were used as a downpayment to purchase the property described in paragraph 5.

203. On April 7, 2023, business bank account ending in 7385 was opened at BOKF in the name of Bringles Auto Broker listing Angela Peterson as the signer. As previously stated, between April 14, 2023, and April 27, 2023, all 3 Treasury checks made out to Bringles Auto Brokers LLC totaling \$376,984.95 were deposited through the ATM into BOKF account ending in 7385. These Treasury checks were deposited approximately 6 months after the Department of Treasury issued the checks and only a few weeks after BOKF account ending in 7385 was opened.

204. Between April 7, 2023, and May 31, 2023, BOKF 7385 received a total of \$381,044.95 in deposits, of which \$378,984.95 were from Treasury refunds for Bringles Auto Broker, making up 99.46% of the total deposits. A breakdown of deposits to BOKF 7385 is as follows:

Deposit Description	Deposits to BOKF 7385	Percentage of Grand Total
Deposit - Cash	\$60.00	0.02%
Transfer from 9451	\$2,000.00	0.52%
Treasury - Bringle Auto Brokers	\$378,984.95	99.46%
Grand Total	\$381,044.95	100.00%

205. On May 4, 2023, after the 3 Treasury checks were deposited, a check from BOKF account ending in 7385 was written to PETERSON in the amount of \$325,000 and a cashier's check for \$25,000 was made out to PETERSON. On the same day, May 4, 2023, both checks for \$325,000 and \$25,000 were deposited into BOKF account ending in 4773. As previously stated, BOKF account ending in 7385 was opened in the name of Bringles Auto Brokers with Angela Peterson as the signer.

206. BOKF account ending in 4773 was opened on or about May 13, 2022, listing PETERSON as the only signer; however, on April 7, 2023, the account was updated to include

PETERSON's daughter, Tyler Peterson, as an added signer on the account. Between May 13, 2022, and May 31, 2023, BOKF 4773 received a total of \$825,143.47 in deposits, of which \$350,000 was from BOKF 7385, making up 42.42% of the total deposits, as follows:

Deposit Description	Deposits to BOKF 4773	Percentage of Grand Total
Clothing	\$24.78	0.00%
Credit builder	\$48.77	0.01%
Deposit - Cash	\$6,400.00	0.78%
Deposit - Cash App	\$13,500.00	1.64%
Real Estate Sale	\$60,000.00	7.27%
Transfer from 0433	\$1,050.00	0.13%
Transfer from 5471	\$31,570.00	3.83%
Transfer from 6678	\$142,845.09	17.31%
Transfer from 6799	\$12,050.00	1.46%
Transfer from 7118	\$78,450.00	9.51%
Transfer from 7385	\$350,000.00	42.42%
Transfer from 9493	\$129,204.83	15.66%
Grand Total	\$825,143.47	100.00%

207. A breakdown of the remaining deposits made to BOKF account ending in 4773 show they are mostly from transfers from PETERSON's other BOKF accounts ending in 6678 and 7118 that also received fraudulent Treasury refunds in the scheme.

208. BOKF account ending in 5471 was opened in the name of Caze & Myers Consultants on or about July 19, 2022, listing PETERSON as the only signer. Between July 19, 2022, and March 20, 2023, BOKF account ending in 5471 received 4 fraudulent Treasury refund checks totaling \$472,171.08 for PETERSON's business Caze & Myers Consultants; of which \$31,570 was transferred to BOKF account ending in 4773.

209. BOKF account ending in 6678 was opened in the name of Operation Lending Hands on or about May 12, 2022, listing PETERSON as the only signer. Between May 13, 2022, and March 20, 2023, BOKF account ending in 6678 received 5 fraudulent Treasury refund checks

totaling \$477,833.44 for PETERSON's business Operation Lending Hands; of which \$142,845.09 was transferred to BOKF account ending in 4773.

210. BOKF account ending in 7118 was opened in the name of Caze Motive on or about September 15, 2022, listing PETERSON as the only signer. Between September 16, 2022, and March 17, 2023, BOKF account ending in 7118 received 3 fraudulent Treasury refund checks totaling \$374,661.34 for PETERSON's business Caze Motive; of which \$78,450 was transferred to BOKF account ending in 4773.

211. On May 5, 2023, the day after the \$325,000 deposit was made into BOKF account ending in 4773, a transfer was made to BOKF account ending in 9493 for \$330,000 listing "house payment" as the memo. Also on May 5, 2023, a wire for \$300,000 was made from BOKF account ending in 9493 to Bayou Title, Inc. (Westbank Escrow).

212. BOKF account ending in 9493 was opened on or about May 12, 2022, listing PETERSON as the only signer, and on April 7, 2023, the account was updated to include Tyler Peterson, as an added signer on the account. Between May 12, 2022, and May 31, 2023, BOKF 9493 received a total of \$916,278.35 in deposits, of which \$414,381.04 was from BOKF 4773, making up 45.22% of the total deposits. A breakdown of deposits to BOKF 9493 show the remaining deposits are mostly from transfers from PETERSON's other BOKF accounts previously mentioned, that also received fraudulent Treasury refunds in the scheme, as follows:

Deposit Description	Deposits to BOKF 9493	Percentage of Grand Total
Deposit - Peterson	\$250.00	0.03%
Interest	\$13.27	0.00%
Real Estate Purchase	\$10,831.04	1.18%
Transfer from 4773	\$414,381.04	45.22%
Transfer from 5471	\$309,100.00	33.73%
Transfer from 6678	\$58,253.00	6.36%
Transfer from 6799	\$2,000.00	0.22%
Transfer from 7118	\$121,450.00	13.25%
Grand Total	\$916,278.35	100.00%

213. Records from Bayou Title, Inc. show that this wire for \$300,000 was for a downpayment on the property listed in paragraph 5. The total purchase price for the property listed in paragraph 5 was approximately \$1,240,000 and PETERSON and Tyler Peterson are listed as the purchasers. On or about May 12, 2023, PETERSON and Tyler Peterson received a mortgage for \$992,000.

214. Given the majority of the funds deposited into PETERSON's BOKF accounts ending in 4773, 9493, 5471, 6678, and 7118 were directly funded from fraudulent Treasury refunds received in the scheme or transfers from BOKF accounts that were directly funded by the fraudulent tax refunds in the scheme. In my training and experience accounts like BOKF account ending in 7385, 4773 and 9493 are sometimes referred to as "shell" bank accounts, essentially a bank account used for the core purpose of obscuring the origin(s) and destination(s) of funds.

Subject Property: 7509 St Charles Avenue, New Orleans, LA 70118

215. According to the Orleans County Deed for the Subject Property, the recorded owner/grantee is SHAWN PETERSON and Tyler Peterson, while the grantor is listed as Paul Casey Geohegan and Leanne Maggiore Geohegan. The Orleans County Deed for the Subject Property was recorded on or about May 12, 2023.

216. According to records provided by Bayou Title, Inc. pursuant to a federal grand jury subpoena, Bayou Title, Inc. received a wire for \$300,000 from PETERSON as a downpayment for the Subject Property.

217. According to records provided via subpoena from MERS, Inc., the loan for Subject Property is Planet Home Lending LLC. A review of PETERSON's bank records for BOKF account ending in 4773, identified the payments list below to "Planet Home" totaling \$45,936.59, reasonably believed to be for the Subject Property, as follows:

ACCOUNT	DATE	DESCRIPTION	AMOUNT
BOKF 4773	12/4/2023	PLANET HOME ACH PMTS 34421	\$11,796.92
BOKF 4773	12/6/2023	PLANET HOME ACH PMTS 34421	\$11,379.89
BOKF 4773	1/4/2024	PLANET HOME ACH PMTS 34421	\$11,379.89
BOKF 4773	2/6/2024	PLANET HOME ACH PMTS 34421	\$11,379.89
		Total	\$45,936.59

IX. Conclusion

218. Based on the foregoing, SHAWN PETERSON used funds traceable to a money laundering scheme to purchase the Subject Property.

219. PETERSON submitted, or caused to be submitted, 5 fraudulent loan applications to various lenders to obtain \$429,566 in funds through the PPP and devised and executed a scheme to defraud the IRS out of at least \$2,764,540 by obtaining money by means of material false and fraudulent pretenses, representations, and promises. PETERSON committed violations of 18 U.S.C. §641, 18 U.S.C. §1014, 18 U.S.C. §1343, 18 U.S.C. §1344(2), and 18 U.S.C. § 1957.

220. The Subject Property listed in paragraph 5 is also subject to civil forfeiture to the United States under Title 18, U.S.C., § 981(a)(1)(A), because they were involved in a transaction in violation of Sections 641, 1014, 1343, and 1344(2), or they were traceable to other property involved in a transaction in violation of Section 1957.

221. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 10, 2024.



Elisa Attaway
Special Agent
IRS, Criminal Investigation